

BELDOCK LEVINE & HOFFMAN LLP
99 PARK AVENUE, PH/26TH FLOOR
NEW YORK, N.Y. 10016

CYNTHIA ROLLINGS
JONATHAN MOORE
JONATHAN K. POLLACK
HENRY A. DLUGACZ
STEPHEN J. BLUMERT
MARC A. CANNAN
DAVID B. RANKIN
LUNA DROUBI
MYRON BELDOCK (1929-2016)
LAWRENCE S. LEVINE (1934-2004)
ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400
FAX: (212) 277-5880
WEBSITE: blhny.com

COUNSEL
BRUCE E. TRAUNER
PETER S. MATORIN
KAREN L. DIPPOLD
JEFFREY A. GREENBERG
MARJORIE D. FIELDS
EMILY JANE GOODMAN
(JUSTICE, NYS SUPREME COURT, RET.)
FRANK HANDELMAN

REF: **9000.097**

WRITER'S DIRECT DIAL:
212-277-5825

VIA ECF

March 22, 2022

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Emamian v. The Rockefeller University*, No. 07 Civ. 3919 (PGG)

Your Honor:

Dr. Emamian comes before the Court on an application for an additional two days to file her Fed. R. Civ. P. 72 objections to the Report and Recommendation. This is the third request for this relief. The first request was granted, the second request for two weeks was granted, then modified to one week. Currently the time to file our objection is tomorrow, and we request permission to file the objection on Friday. The defendant's position on this application was requested earlier this afternoon, but as of this writing, it is unknown. We acknowledge that the timing of this application is out of compliance with Your Honor's Individual Rule E, however, the application constitutes an emergency as the medical conditions discussed below have been unexpected.

The basis for the request is the principal author of our post appeal litigation, Regina Powers is, and has been, out with COVID-19. Further, Luna Droubi has been in and out of medical appointments due to numerous complications related to her pregnancy. Other pressing deadlines have made meeting the current date unreasonably difficult.

If this motion is granted, the new dates would be:

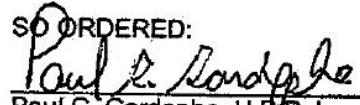
Fed. R. Civ. P. 72 Objection:
Defendant's Response:

March 18, 2022
April 15, 2022

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: March 16, 2022

BELDOCK LEVINE & HOFFMAN LLP

Hon. Paul G. Gardephe
March 15, 2022
Page 2

We thank Your Honor your consideration of this request.

Respectfully submitted,



Jonathan C. Moore
David B. Rankin
Luna Droubi
Regina Powers